

WEIL, GOTSHAL & MANGES LLP  
Richard W. Slack (*pro hac vice*)  
(richard.slack@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
David A. Taylor (#247433)  
(dtaylor@kbbkllp.com)  
Thomas B. Rupp (#278041)  
(trupp@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' AMENDED  
REPORT ON RESOLUTION OF  
ELEVENTH SECURITIES CLAIMS  
OMNIBUS OBJECTION (CLAIMS  
BARRED BY THE STATUTE OF  
REPOSE) WITH RESPECT TO CERTAIN  
CLAIMS**

**[Re: Dkt. Nos. 11014, 11198, 11211, 11400]**

**Regarding Objection Set for Hearing  
October 19, 2021, at 10:00 a.m. (Pacific  
Time)**

**AMENDED REPORT ON RESOLUTION OF CERTAIN CLAIMS**

In advance of the October 19, 2021, 10:00 a.m. omnibus hearing (the “**Hearing**”), PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby submit this amended report on the resolution of certain Claims in the following securities claims omnibus objection to fix an error in one claim number referenced below:

| Docket No. | Omnibus Objection   |
|------------|---|
| 11014      | <i>Reorganized Debtors’ Eleventh Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)</i> (the “ <b>Eleventh Securities Claims Omnibus Objection</b> ”) |

| Docket No.  | Claimant          | Claim Nos.   | Resolution   |
|---|-------------------|--|--|
| <b>Eleventh Securities Claims Omnibus Objection</b> |                   |  |  |
| 11168   | PGIM FI Claimants | 100936, 100967, 100969, 101026, 101123, 100945, 101239, 101149, 101008, 101067, 100941, 101322, 101427 | The Eleventh Securities Claims Omnibus Objection has been <b>WITHDRAWN</b> without prejudice with respect to these Claims. |
| 11170   | State of Oregon   | 100806, 100931   | The Eleventh Securities Claims Omnibus Objection has been <b>WITHDRAWN</b> without prejudice with respect to these Claims. |
| 11171   | JIBEI Claimants   | 101683, 100193, 99659, 100084  | The Eleventh Securities Claims Omnibus Objection has been <b>WITHDRAWN</b> without prejudice with respect to these Claims. |

| Docket No. | Claimant                      | Claim Nos.   | Resolution   |
|------------|-------------------------------|--|--|
| 11172      | Invesco Claimants             | 102249, 102188, 102179,<br>102021, 101437, 101894,<br>102228, 102172   | The Eleventh Securities<br>Claims Omnibus<br>Objection has been<br>WITHDRAWN<br>without prejudice with<br>respect to these Claims. |
| 11177      | KKR Claimants                 | 101782, 101906, 101564,<br>101903, 101642, 101996  | The Eleventh Securities<br>Claims Omnibus<br>Objection has been<br>WITHDRAWN<br>without prejudice with<br>respect to these Claims. |
| 11187      | Hartford Claimants            | 100313, 100877, 101156,<br>101189, 101204, 101225,<br>101383, 101956, 101958,<br>101981, 102003, 102027,<br>102069 | The Eleventh Securities<br>Claims Omnibus<br>Objection has been<br>WITHDRAWN<br>without prejudice with<br>respect to these Claims. |
| 11207      | PepsiCo, Inc. Master<br>Trust | 98712  | The Eleventh Securities<br>Claims Omnibus<br>Objection has been<br>WITHDRAWN<br>without prejudice with<br>respect to this Claim.   |
| 11203      | AmeriTrust Claimants          | 103017, 103127, 104332   | The Eleventh Securities<br>Claims Omnibus<br>Objection has been<br>WITHDRAWN<br>without prejudice with<br>respect to these Claims. |
| 11209      | Vanguard Claimants            | 102343, 102344, 102457,<br>102566, 101946, 102309,<br>102518, 102572 <sup>1</sup>                                  | The Eleventh Securities<br>Claims Omnibus<br>Objection has been<br>WITHDRAWN<br>without prejudice with<br>respect to these Claims. |

<sup>1</sup> This amended report corrects a typographical error in the original report [Docket No. 11400], which inadvertently referred to Claim No. 102572 as Claim No. 105272.

1 With respect to each of the proofs of claim set forth above (the “**Proofs of Claim**”), the Eleventh  
2 Securities Claims Omnibus Objection objected thereto on the basis that the applicable statute of repose  
3 barred claims arising under Section 11 of the Securities Act of 1933 (the “**Securities Act Claims**”).  
4 Each of the above claimants responded to the Eleventh Securities Claims Omnibus Objection and  
5 arguably purport to assert claims other than Securities Act Claims. They did not deny that the statute of  
6 repose was applicable to, and barred, their Securities Act Claims.

7 Rather than proceeding to seek to expunge only the Securities Act Claims and leave the Proofs  
8 of Claim partially denied and partially unresolved at this time, the Reorganized Debtors have withdrawn  
9 the Eleventh Securities Claims Omnibus Objection, without prejudice, with respect to the Proofs of  
10 Claim. The Reorganized Debtors currently intend to object to each of the Proofs of Claim. The  
11 Reorganized Debtors reserve the right to object to the Proofs of Claim on any basis, including but not  
12 limited to that the applicable statute of repose bars some or all of the claims asserted in the Proofs of  
13 Claim.

14  
15  
16 Dated: October 18, 2021

**WEIL, GOTSHAL & MANGES LLP**

**KELLER BENVENUTTI KIM LLP**

17 By: /s/ Richard W. Slack

18  
19  
20 Richard W. Slack

21 *Attorneys for Debtors and Reorganized Debtors*  
22  
23  
24  
25  
26  
27  
28